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December 2, 2021

**VIA ECF AND UNDER SEAL**

The Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States of America v. Jason Servis, 20 Cr. 160-10 (MKV)

Dear Judge Vyskocil:

We represent Mr. Jason Servis, who is currently on release in the above-referenced matter. Mr. Servis respectfully moves for an order modifying the conditions of his release to allow him to travel to the Northern District of West Virginia. AUSA Andrew Adams and Pretrial Services Officer Dayshawn Bostic have no objection to this requested modification.

Presently, Mr. Servis's release conditions permit him to travel to the: (i) Southern District of New York, (ii) Eastern District of New York, (iii) District of New Jersey, and (iv) Southern District of Florida, and transit points in between. *See* Dkt. No. 184. We seek to add the Northern District of West Virginia to this list, as his parents reside there.

In May 2021, Mr. Servis's father (90) [REDACTED], which required him to be [REDACTED]. Approximately five months ago, his father was [REDACTED]. Mr. Servis's father was [REDACTED] and, while he is now home, he [REDACTED]. His mother (89) [REDACTED]. Due to their age and [REDACTED], Mr. Servis needs to be attentive to their care on a more regular basis. The requested modification would facilitate Mr. Servis's travels to West Virginia to visit and care for his parents more regularly and more quickly in the event of an emergency.

Under the applicable statutes, Mr. Servis's conditions of release should consist of the least restrictive condition, or combination of conditions, needed to reasonably assure Mr. Servis's appearance in this matter and the safety of others, and the Court may amend his prior conditions of release at any time. *See* 18 U.S.C. § 3142(c)(1)(B) and (c)(3). The Court has previously granted Mr. Servis permission to travel to Charles Town, West Virginia to care for his parents, and his travel on those occasions occurred without incident. *See* Dkt. Nos. 263, 386, 428, 476. Further, Mr. Servis has substantial ties to Charles Town, West Virginia. He was born and raised there. His parents have lived in that community for nearly seven decades. Neither Mr. Servis nor any of his family members have ever lived abroad. Given the above, Mr. Servis is not a flight risk. Additionally, while the charges he faces are serious, Mr. Servis is not charged with a violent crime

December 2, 2021

Page 2

and poses no safety threat to other persons. According to his Pretrial Services Officer, Mr. Servis has fully complied with the conditions of his release.

We respectfully request that Mr. Servis's release conditions be modified to permit his travel to the Northern District of West Virginia to visit and care for his parents.

Thank you for considering this request.

Sincerely yours,

/s/

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Rita M. Glavin

Cc: AUSA Andrew Adams (by email and ECF)  
Pretrial Services Officer Asst, Dayshawn Bostic (by email)